IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	**Case No.: 2:06cr228-CSC**
	)	
RENEE N. SHOUP	)	

UNOPPOSED MOTION TO CONTINUE TRIAL

NOW COMES the Defendant, Renee A. Shoup, by and through the undersigned counsel, Michael J. Petersen, and respectfully moves this Court to reset the above-referenced matter now scheduled for trial on the January 8, 2007 misdemeanor trial docket to allow for the consideration of pretrial diversion in this matter.

In support of this Motion, defendant would show:

1. Undersigned counsel has requested Pretrial Diversion for Defendant.

2. Undersigned counsel discussed the matter of Pretrial Diversion with Special United States Attorney Frazier on December 6, 2006 and was informed that the Defendant's request for Pretrial Diversion has been forwarded to the United States Attorney's office with his recommendation for Pretrial Diversion.

3. The United States Probation Office is currently evaluating the Pretrial Diversion request. Undersigned counsel is of the information and belief that said evaluation will not be completed prior to the date now set for the trial of the above matter.

4. Counsel for the prosecution does not oppose this motion.

WHEREFORE, defendant respectfully requests that this Motion be granted and the trial now set on the January 8, 2007 misdemeanor trial docket be continued to the next misdemeanor trial docket.

Dated this the 13th day of December, 2006.

s/ Michael J. Petersen
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ASB-5072-E48M

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Kent Brunson, AUSA
One Court Square, Suite 201
Montgomery, AL 36014

Neal B. Frazier, Special AUSA
42 ABW/JA
50 LeMay Plaza South
Maxwell AFB, AL 36112

Respectfully submitted,

s/ Michael J. Petersen
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